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ORIGINAL FILED  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

APR 04 2012

John A. ... Executive Officer/Clerk  
Glorietta Robinson, Deputy

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17 Attorneys for Defendant and Cross-Complainant CITY OF BURBANK, including the  
18 POLICE DEPARTMENT OF THE CITY OF BURBANK (erroneously sued as an  
19 independent entity named "BURBANK POLICE DEPARTMENT")

20 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
21 FOR THE COUNTY OF LOS ANGELES

22 OMAR RODRIGUEZ; CINDY GUILLEN-  
23 GOMEZ; STEVE KARAGIOSIAN; ELFEGO  
24 RODRIGUEZ; AND JAMAL CHILDS,

Case No. BC 414602

Judge: The Honorable Joanne O'Donnell  
Dept.: 37

25 Plaintiffs,  
26 v.

27 BURBANK POLICE DEPARTMENT; CITY  
28 OF BURBANK; AND DOES 1 THROUGH  
100, INCLUSIVE,  
29 Defendants.

DECLARATION OF VERONICA VON  
GRABOW IN SUPPORT OF DEFENDANT  
CITY OF BURBANK'S BRIEF RE  
PLAINTIFF STEVE KARAGIOSIAN'S  
FAILURE TO EXHAUST  
ADMINISTRATIVE REMEDIES

30 BURBANK POLICE DEPARTMENT; CITY  
31 OF BURBANK,

[Trial Brief; Appendix Of Non-California  
Authorities Filed Concurrently Herewith]

32 Cross-Complainants,  
33 v.

File Date: May 28, 2009  
Trial Date: March 19, 2012 (Karagiosian)

34 OMAR RODRIGUEZ, an Individual;  
35 Cross-Defendant.

Discovery Referee: Hon. Diane Wayne, Ret.

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**EXHIBIT A**

**EXHIBIT A**

PAGE

1 MR. GRESEN: YES, 158, PAGE TEN.

2 Q BY MS. SAVITT: OKAY. WOULD YOU TAKE A LOOK AT

3 158.

4 (EXHIBIT WAS MARKED FOR IDENTIFICATION.) 158

5 (WITNESS REVIEWED DOCUMENT.)

6 Q BY MS. SAVITT: THAT IS AN ADMINISTRATIVE CHARGE

7 THAT WAS FILED ON YOUR BEHALF WITH THE DEPARTMENT OF FAIR

8 EMPLOYMENT AND HOUSING; CORRECT?

9 A ON MY BEHALF, YES.

10 Q AND WHAT WAS -- AND YOUR LAWYER FILED IT FOR YOU;

11 RIGHT?

12 A THAT'S RIGHT.

13 Q YOU DIDN'T SIGN IT, DID YOU?

14 A I DON'T BELIEVE SO.

15 Q WHAT IS THE DATE IT WAS FILED, SIR?

16 IT SHOULD BE IN THE BOTTOM \LEFT HAND\LEFT-HAND CORNER.

17 A I'M SORRY. BOTTOM LEFT --

18 Q IT'S A MAY 24TH --

19 A MAY 27TH, IS THAT CORRECT?

20 Q MAY 27TH, 2009; CORRECT?

21 A 2009, YES.

22 Q AND AS OF MAY 27TH, 2009, DO YOU KNOW IF AARON

23 KENDRICK HAD BEEN DISCIPLINED?

24 A HE WAS, YES.

25 Q AND IS IT TRUE THAT TWO WEEKS BEFORE MAY 27TH,

**EXHIBIT B**

**EXHIBIT B**

1 158? IT'S IN THE BOOK AS 158.

2 MS. SAVITT: I MEANT PAGE TEN OF EXHIBIT 158, AND I'M NOT  
3 OFFERING IT INTO EVIDENCE. I'M JUST IDENTIFYING IT.

4 MR. GRESEN: I THINK IT'S PREVIOUSLY BEEN IDENTIFIED.

5 MS. SAVITT: I'M SORRY. I DIDN'T HEAR.

6 MR. MICHAELS: HE SAID IT'S PREVIOUSLY BEEN IDENTIFIED.

7 THE COURT: YES. YES.

8 158 HAS BEEN. OKAY.

9 Q BY MS. SAVITT: NOW LOOKING AT PAGE TEN. I THINK  
10 THAT'S THE PAGE WE LOOKED AT YESTERDAY; IS THAT CORRECT,

SIR?

11

12 A I DON'T KNOW IF IT WAS THE FIRST PAGE OF WITH UN58

OR

13 158-TEN, SO --

14 Q DID YOU REVIEW THIS DOCUMENT BEFORE IT WAS SUBMITTED  
15 TO THE DEPARTMENT OF FAIR EMPLOYMENT AND  
16 HOUSING?

17 A I DON'T KNOW IF I DID. I CAN'T TELL YOU IF I DID OR  
18 DIDN'T. IT'S POSSIBLE I DID. I DON'T KNOW.

19 Q YOU DON'T KNOW? OKAY.

20 MS. SAVITT: THAT'S ALL I HAVE AT THIS TIME, YOUR HONOR.

21 THE COURT: REDIRECT?

22 MR. GRESEN: THANK YOU, YOUR HONOR.

23 REDIRECT EXAMINATION

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 I am employed in the County of Los Angeles, State of California.

4 I am over the age of 18, and not a party to the within action; my business address is First  
Legal Support Services, 1517 West Beverly Boulevard, Los Angeles, California 90026

5 On April 6, 2012, I served the foregoing document(s) described as **DECLARATION OF**  
6 **VERONICA VON GRABOW IN SUPPORT OF DEFENDANT CITY OF BURBANK'S**  
7 **BRIEF RE PLAINTIFF STEVE KARAGIOSIAN'S FAILURE TO EXHAUST**  
8 **ADMINISTRATIVE REMEDIES** which was enclosed in sealed envelopes addressed as  
follows, and taking the action described below:

8 Solomon E. Gresen, Esq., [seg@rglawyers.com](mailto:seg@rglawyers.com)

9 Steven V. Rheuban, Esq., [svr@rglawyers.com](mailto:svr@rglawyers.com)

9 Law Offices of Rheuban & Gresen

10 15910 Ventura Boulevard, Suite 1610

10 Encino, CA 91436

11 T: (818) 815-2727

11 F: (818) 815-2737

12 *Attorneys for Plaintiffs Cindy Guillen-Gomez, Steve Karagiosian, Elfego Rodriguez, and Jamal*  
*Childs*



13 **BY PERSONAL SERVICE:** I hand delivered such envelope(s):

14 ☐ to the addressee(s);

15 ☒ to the receptionist/clerk/secretary in the office(s) of the addressee(s).

16 ☐ by leaving the envelope in a conspicuous place at the office of the addressee(s)  
17 between the hours of 9:00 a.m. and 5:00 p.m.

18 I declare under penalty of perjury under the laws of the State of California that the above is  
19 true and correct.

20 Executed on April 6, 2012, at Los Angeles, California.

21 ENAYAT HAJIRASOULI

22 Printed Name

21 E-H

22 Signature